

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**IN RE:**  
**Jeffrey Herrmann Jaffe**

**DEBTOR(S)**

**Morris D. Jaffe**  
**MOVANT**

**vs.**

**Jeffrey Herrmann Jaffe**

## RESPONDENTS

**CASE NO. 16-50355G**

**CHAPTER 11**

**RESPONSE TO MORRIS D. JAFFE'S FOR ORDER MODIFYING AUTOMATIC STAY  
TO ALLOW HIM TO PROSECUTE PENDING LITIGATION IN THE 37TH JUDICIAL  
DISTRICT COURT OF BEXAR COUNTY, TEXAS**

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now, Debtor (so denominated whether individual or joint), and files this, Response to Creditor's Motion For Relief From Stay Against Property by Morris D. Jaffe and in support thereof would show the Court as follows:

1. Debtor admits the allegations contained in paragraph(s) 1, 2, 5, 6, and 7 of Movant's motion. Debtor admits the allegations contained in paragraph(s) 3 of Movant's motion and asserts that Debtor as that time was pro se and had been unable to retain new counsel who would file a response to the Motion and still has been unable to retain counsel.
2. Debtor denies the allegations contained in paragraph(s) 11, 13, 14, 15, 16 and 20 of Movant's motion.
3. Debtor admits the allegations contained in paragraph(s) 4 but denies the last sentence.
4. Debtor admits the first sentence of paragraph 8 but denies it was in 2011 and was in 2009, asserts the payments were stopped at the instruction of Movant, lacks sufficient knowledge or information to form a belief about the truth of the allegations if Movant obtained a letter from

IBC permitting and authorizing to foreclose, admits sentence 3 but asserts the letter was done to satisfy IBC and admits the 4th and 5th sentence of Paragraph 8 of Movant's motion.

5. Debtor admits the 1st sentence of paragraph 9, admits the 2nd sentence and asserts payments were not made at the request of Movant, can neither admit nor deny the 3rd sentence and admits the remaining allegations of paragraph 9.

6. Debtor admits the first sentence of paragraph 10, but asserts the arguments are not specious, and denies the Motion for Summary Judgment was meritorious and denies the remainder of the paragraph.

7. Debtor lacks sufficient knowledge or information to form a belief about the truth of the allegations of the first sentence of paragraph 17 and denies the remainder of the paragraph.

8. In response to paragraph 18 of the Motion, as far as the insurance section, Movant denies the 1st and 3rd sentence and lacks information to form a belief as to the truth of the amount of insurance paid by Movant. As far as the ad valorem section in response to the 1st sentence, Debtor admits the sentence but asserts that he has been on a payment arrangement for the taxes, denies that Movant has paid "most" of the taxes and denies the last sentence of the paragraph. In response to the adequate income section, Debtor admits the 1st and 2nd sentence, denies the 3rd sentence, admits the 4th sentence and denies the remaining allegations of the paragraph.

9. Debtor lacks sufficient knowledge or information to form a belief about the truth in paragraph 19.

10. Debtor denies the allegations contained in the Prayer paragraph of Movant's motion.

11. Debtor denies all remaining allegations of the Motion not otherwise admitted.

PRAYER

Wherefore, premises considered, Debtor prays Morris D. Jaffe's Motion For Relief From Stay Against Property be denied, and for such other and further relief to which Debtor may be entitled.

Respectfully submitted,

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**ATTORNEYS FOR DEBTOR**

**CERTIFICATE OF SERVICE**

On July 6, 2016, a copy of the above and foregoing document was served via electronic means listed on the Court's ECF noticing system, mailed or hand delivered to:

U.S. Trustee  
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